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INTERNATIONAL DATA SECURITY, INC.;
15 INTERNATIONAL MARITIME SECURITY
ALLIANCE, LLC; and QUANTUM ROUTE, INC.

16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**

19 MARINE DESIGN AND OPERATIONS, INC.,) **CASE NO.: CV-08-3397 (SI)**
a New Jersey corporate entity,)

20 Plaintiff,)

21 v.)

22 SS PACIFIC STAR, her engines, tackle,
equipment, appurtenances, freights, cargo, etc.)
23 (Official Number 239932) *in rem*,)
INTERNATIONAL DATA SECURITY, INC., a)
24 Delaware corporate entity; INTERNATIONAL)
MARITIME SECURITY ALLIANCE, LLC, a)
25 Delaware corporate entity; MARITIME)
SECURITY ALLIANCE, LLC, a corporate)
26 entity of a state of the United States; and)
QUANTUM ROUTE, INC., a California)
27 corporate entity, *in personam*,)

28 Defendants.)

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE FOR 60 DAYS
LAST DAY TO COMPLETE ADR AND
FURTHER CASE MANAGEMENT
CONFERENCE**

**STIPULATION AND [PROPOSED] ORDER TO CONTINUE FOR 60 DAYS LAST DAY
TO COMPLETE ADR AND FURTHER CASE MANAGEMENT CONFERENCE (CV-08-3397 (SI))**

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1. All of the parties appearing in this action through their below-signed counsel stipulate and request that this Court extend the time for the parties to complete ADR 60 days to and including March 9, 2009 and seek a related continuance of the further Case Management Conference from January 30, 2009 to March 30, 2009, or as soon thereafter as this Court's schedule may allow. This is the first request for a continuance of a Court-ordered date.

2. The reason for this request is that the current last day to complete ADR is January 8, 2009, with an ENE set for January 6, 2009. On December 15, 2008, ESCO Marine Inc. filed a lawsuit against two of the *in personam* defendants in this lawsuit (International Data Security, Inc. and International Maritime Security Alliance, LLC) as well as the *in rem* defendant SS PACIFIC STAR (*ESCO Marine Inc. v. SS PACIFIC STAR, et al.*, U.S.D.C. N.D. Cal. Case No. 08-CV-5575-MEJ) and has sought to have the two cases formally "related" pursuant to Local Rule 3-12.

3. In the interest of judicial economy as well as saving expenses for the several parties involved, the parties in this lawsuit have stipulated to the requested continuances subject to this Court's order.

4. The below-signed, George W. Nowell, Esq. representing plaintiff in this action, has spoken with the ENE neutral, Forrest Booth, Esq., and confirmed that he has no objection to the vacation of the January 6, 2009 ENE date in favor of a subsequent date. Elise Sara, Esq., representing the appearing defendants in this action, has contacted the ADR coordinator, who has confirmed that all their department needs is a stipulation and signed order for their records.

IT IS SO AGREED.


Dated: December 23, 2008

LAW OFFICES OF
 GEORGE W. NOWELL

By: George W. Nowell
 GEORGE W. NOWELL
 Attorneys for Plaintiff and Counterclaim Defendant
 MARINE DESIGN AND OPERATIONS, INC.

1 Dated: December 23, 2008

**SHEPPARD MULLIN
RICHTER & HAMPTON LLP**


3 By: 

5 ELISE K. SARA
Attorneys for Defendants and Counterclaimants
INTERNATIONAL DATA SECURITY, INC.;
INTERNATIONAL MARITIME SECURITY
7 ALLIANCE, LLC; and QUANTUM ROUTE, INC.

8 Pursuant to the stipulation set forth above, IT IS ORDERED THAT the last day to
9 complete the ADR process is continued from January 8, 2009 to March 9, 2009 and the further
10 Case Management Conference currently set for January 30, 2009 is continued to March 30,
11 2009. 27

13 Dated: _____, 2008

**UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF
CALIFORNIA**

15 By: 
16 HON. SUSAN ILLSTON
17 UNITED STATES DISTRICT JUDGE

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